

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA**

The Plaintiffs' Leadership Group ("PLG") and Defendant United States of America jointly move the Court to enter the attached proposed order amending Case Management Order No. 14.

On July 9, 2024, this Court issued Case Management Order No. 14 (CMO-14), appointing Thomas J. Perrelli, of Jenner & Block, LLP, and Christopher G. Oprison, of DLA Piper, as Settlement Masters. *See* D.E. 251 at 1 (CMO-14). As explained in CMO-14, the Court appointed the Settlement Masters to “assist with facilitating discussions directly related to the Parties’ establishing a settlement structure for Camp Lejeune Justice Act (“CLJA”) cases.” *Id.* at 2. The Settlement Masters have issued periodic status reports, explaining that the Settlement Masters have worked with the Parties to develop and disseminate a questionnaire as part of their efforts to establish such a settlement structure. *See* D.E. 406 (2d Status Report by Settlement Masters).

The Parties have discussed with the Settlement Masters, and agree that amending CMO-14 will materially assist in their efforts to disseminate a questionnaire. Specifically, the Settlement Masters should be permitted to receive Department of Justice data, including government data related to individual administrative claims, where such data is relevant and necessary to their duties under CMO-14. Currently, CMO-14 contemplates the potential need for the Settlement Masters to access Department of Justice data, as well as the data security standards that may govern such access. D.E.

251 at 6 (CMO-14). CMO-14 does not, however, describe when such access may be “needed.” CMO-14 should be clarified to allow such access to Department of Justice data where the Department of Justice has determined such data is relevant and necessary to the Settlement Masters’ duties. In particular, the Parties believe the Settlement Masters will require access to at least some individual administrative claims information, in order to identify claimants randomly selected to complete a questionnaire.

DATED this 28th day of July 2025.

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CERTIFICATE OF SERVICE

I certify that, on July 28, 2025, a copy of the foregoing Joint Motion to Amend Case Management Order No. 14 was served electronically on all counsel of record in this matter through the Court's CM/ECF.

Dated: July 28, 2025

/s/ Nathan J. Bu